

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TIMOTHY JACKSON,

Plaintiff,

v.

LAURA WRIGHT, et al.,

Defendants.

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Civil Action No. 4:21-cv-00033

JURY

JOINT MOTION FOR EXTENSION TO FILE A RESPONSIVE PLEADING

The parties to the above-captioned civil action jointly submit this motion requesting a one-week extension of their deadline to respond to the Motions for Summary Judgment filed December 20, 2024, to January 17, 2025. In support of this request, Defendants state the following:

1. On November 13, 2024, Plaintiff filed an unopposed motion to extend the dispositive motions deadline to December 21, 2024. The Court granted the motion on November 21, 2024.
2. On December 20, 2024, parties timely filed their respective summary judgment briefs.
3. The parties are currently engaging in settlement negotiations.
4. The parties therefore respectfully request the extension in light of the holidays and so that they can continue settlement negotiations.
5. Federal Rule of Civil Procedure 6(b)(1)(A) provides that the Court may extend filing deadlines at its discretion. The undersigned counsel seeks this extension of time for good cause shown and in the interest of justice, and not to cause

unnecessary delay. No party will be prejudiced if the extension sought herein is granted.

6. No other deadline is proposed to be extended.
7. Counsel for Defendants and Plaintiff have conferred and agree to seek this extension.
8. For the reasons stated above, Defendants request that this Court extend the deadline to file responsive pleadings to January 17, 2025.

Respectfully Submitted,

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CERTIFICATE OF CONFERENCE

I, the undersigned attorney, hereby certify to the Court that on December 27, 2024, I conferred with Michael Allen, counsel for Plaintiff, who indicated he agrees to seeking a one-week extension.

/s/ Mary B. Quimby
MARY B. QUIMBY
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of December, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically provided notice to the following CM/ECF participants:

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